

Karen Ladner Ruhr

HANCOCK COUNTY CIRCUIT CLERK
152 MAIN STREET, SUITE B
BAY ST. LOUIS, MISSISSIPPI 39520

228-467-5265
228-467-5266
228-467-2779 Fax

GULFPORT: 228-868-1913
TOLL FREE: 1-800-771-9942

CERTIFICATE OF CLERK AS TO CERTIFIED COPY

STATE OF MISSISSIPPI

COUNTY OF HANCOCK

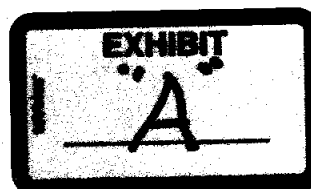

I, Karen Ladner Ruhr, Clerk of the Circuit Court of the said County and State, hereby certify
that the foregoing pages contain a true and correct copy of the file from the Circuit Court of said
County and State in Cause number 15-0062 Styled:

DOUGLAS HANDSHOE
VS
THE HALIFAX HERALD LIMITED
JOHN DOE

as the originals of same appear of record and file in my office.

Given under my hand and official seal affixed, this the 17th day of March, 2015.

Karen L. Ruhr
KAREN LADNER RUHR
HANCOCK COUNTY
CIRCUIT CLERK
BY: *H. Con*



1 General Docket, Civil Cases, Circuit Court, Hancock Circuit Clerk

No. 15-0062

CFN 14255

HANDSHOE, DOUGLAS
VS.

Counsel for Plaintiff

Counsel for Defendant

THE HALIFAX HERALD LIMITED/JOHN DOE
DEFAMATION

JUDGE Roger T. Clark

DATE

ORDERS, JUDGMENTS, ETC.

2/13/15 Complaint Filed

2/13/15 Summons issued to Plaintiff

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

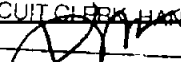
CIVIL ACTION NUMBER

THE HALIFAX HERALD LIMITED

JOHN DOE

DEFENDANT

15-0062
FILED
FEB 13 2015

KAREN LADNER RUHR
CIRCUIT CLERK HANCOCK CO
BY  D C

CIVIL COMPLAINT FOR DAMAGES

Comes now into the Court your Plaintiff Douglas Handshoe who files this compliant against The Halifax Herald Limited for Defamation and in support states as follows:

I. PARTIES

1. Plaintiff is a Mississippi resident and owner of Slabbed New Media, LLC, which resides in and publishes the investigative weblog located at www.slabbed.org in this Judicial District.
2. Defendant, The Halifax Herald Limited, is a limited company formed under the laws of Nova Scotia, Canada with registered offices located at 2717 Joseph Howe Drive, Halifax, Nova Scotia Canada, B3L 2T2, mailing address P. O. Box 610, ATT. M. L. Croft, Halifax, NS Canada B3J 2T2.
3. Defendant, John Doe, is the unknown author of the publication at issue, but upon knowledge of belief is a resident of the County of Canada, Province of Nova Scotia.

II. JURISDICTION AND VENUE

4. Plaintiff's claims arise under Mississippi Law for the Intentional Tort of Defamation.
5. This Court has personal jurisdiction over Defendant because Defendant intentionally caused harm to Plaintiff Handshoe in Mississippi via publication of the defamatory

content of a story dated February 14, 2015, including causing damages, which subject the defendant to the jurisdiction and venue of this Honorable Court. Defendant knew or should have known that his conduct would subject him to the jurisdiction and venue in this Court by publishing the defamatory content on the internet.

6. Jurisdiction and venue are proper under section 13-3-57 Mississippi Code Annotated (1972) as this is the court of original jurisdiction involving the tort of defamation. It is anticipated that damages will ultimately exceed \$75,000. Plaintiff is seeking punitive damages in addition to actual damages.

III. FACTUAL BACKGROUND

7. Plaintiff has been the victim of an ongoing scheme to cover up the roles of Trout Point Lodge, Ltd, Vaughn Perret, Daniel Abel and Charles Leary (the Trout Point Group) in a bribery and money scheme masterminded by former Jefferson Parish President Aaron Broussard, who is now incarcerated pursuant to a plea bargain reached with federal prosecutors. Trout Point, Perret and Abel have conducted a campaign of litigation terrorism alleging the tort of defamation against Plaintiff, the Times Picayune and Louisiana Media Company, LLC more commonly known as Fox 8 New Orleans. This campaign of litigation terrorism has included suing four lawyers that have previously represented Plaintiff along with one of their own Henry Laird. The Trout Point group has collectively sued Plaintiff five times in total including three suits in Canada and two in Louisiana.
8. These lawsuits by the Trout Point Group are designed to harass and defame Plaintiff. The United States district Court has previously ruled the Trout Point Group's first Canadian

lawsuit was so poorly plead it could not have garnered a default in the United States as a matter of law in *Trout Point et al v Handshoe* 729 F. 3d 481.

9. At various times in 2011, in their Canadian defamation action against Louisiana Media Company, the Trout Point Group, in collusion with certain Louisiana businessmen that had participated in the Broussard Nova Scotia bribery scheme, submitted sworn affidavits in support of the defamation action which detailed the business relationship the Trout Point Group had with the Louisiana registered Limited Liability Company Nova Scotia Enterprises, LLC. Slabbed New Media, LLC obtained these affidavits and published them in January and February 2012.
10. On August 31, 2012, the United States Attorney in the case styled USA v Broussard revealed that Nova Scotia Enterprises, LLC was a Broussard bribery scheme.
11. On September 30, 2013, in the very case that is subject to The Halifax Herald reporting alleged as defamatory, the Trout Point Group admitted that Nova Scotia Enterprises never owned anything of value in Nova Scotia, confirming real estate abstracts that were posted to the Slabbed New Media website on September 8, 2011.
12. The affidavits presented in the Trout Point Group's Nova Scotia Louisiana Media defamation suit therefore depicted sham financial transactions with a fictional entity that was never registered to conduct business in Nova Scotia Canada that was later identified as a Broussard bribery scheme.
13. The Halifax Herald Limited newspaper the Chronicle Herald, in writing about these proceedings in an article titled "Lodge Owners Win Defamation Case", never undertook so much as a cursory investigation of the proceedings in these Canadian court actions, to

which the Plaintiff defaulted rather than submit to the jurisdiction of the Canadian courts instead mischaracterizing Plaintiff's reporting as a regurgitation of retracted material from the Times Picayune. These characterizations are materially false and misleading.

14. Worse, defendant The Halifax Herald additionally and falsely categorized the Plaintiff's reporting on same on February 14, 2014 as a campaign of homophobia and Plaintiff as a "anti homosexual blogger", a defamatory assertion that is both materially false and was made with reckless disregard for the truth. There has never been such a finding in a court of law.
15. Canadian courts and its newspapers have become the refuge for felonious United States politicians. The publication in question has injured and damaged Plaintiff's reputation in Mississippi.

IV. CAUSE OF ACTION

COUNT 1: DEFAMATION

16. Plaintiff hereby incorporates and realleges all of the allegations in paragraphs 1 through 15 of this petition.
17. By publishing the article to a public website at <http://thechronicleherald.ca/novascotia/1187315-lodge-owners-win-defamation-case> Defendants published or caused to be published these false statements to numerous third parties.
18. The article referenced in this complaint was and remain, false, defamatory and libelous and published with reckless disregard for the truth.

19. The article referenced in this complaint contains statements of facts that appear nowhere in the court record that are not subject to privilege.
20. The article referenced in this complaint was and remains of a character that would tend to harm Plaintiff's reputation, lowered his status in the eyes of his community and clientele deterring others from associating and dealing with him and have otherwise exposed him to contempt.
21. As a proximate cause of the defendant's publication of the defamatory statements listed in this complaint Plaintiff has suffered loss to his trade, business and reputation.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- a. For actual damages according to proof;
- b. For punitive damages according to proof.
- c. For such other and further relief as the Court shall find just and proper.

Submitted this 13th day of February, 2015.



Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
Phone: (601) 928-5380
earning04@gmail.com

COVER SHEET Civil Case Filing Form <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		Court Identification Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">231CD</div> County # Judicial Court ID District (CH, CI, CO)	Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">2015</div>	Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">00063</div> <div style="border: 1px solid black; padding: 2px; display: inline-block; width: 40px; height: 20px; margin-top: 5px;"></div> Local Docket ID
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Revised 1/1/2001)		This area to be completed by clerk
IN THE <u>CIRCUIT</u> COURT OF <u>HANCOCK</u> COUNTY				
Short Style of Case: <u>Handshoe v The Halifax Herald Limited</u>				
Party Filing Initial Pleading: Type/Print Name <u>Douglas Handshoe</u> MS Bar No. _____				
<input checked="" type="checkbox"/> Check (✓) if Not an Attorney <input checked="" type="checkbox"/> Check (✓) if Pro Hac Vice Signature _____				
Compensatory Damages Sought: \$ <u>According to proof</u> Punitive Damages Sought: \$ <u>According to Proof</u>				
Is Child Support contemplated as an issue in this suit? <u>Yes</u> <input checked="" type="checkbox"/> No If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment				
PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM				
Individual <u>Handshoe</u> <u>Douglas</u> (_____) <u>K</u> Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV				
Address of Plaintiff <u>214 Corinth Drive, Bay St Louis, MS 39520</u>				
<input checked="" type="checkbox"/> Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____				
Estate of _____				
<input checked="" type="checkbox"/> Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____				
D/B/A / Agency _____				
Business _____				
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated				
<input checked="" type="checkbox"/> Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____				
D/B/A: _____				
DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM				
Individual _____ (_____) _____ Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV				
<input checked="" type="checkbox"/> Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____				
Estate of _____				
<input checked="" type="checkbox"/> Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____				
D/B/A / Agency <u>The Halifax Herald Limited</u>				
Business _____				
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated				
<input checked="" type="checkbox"/> Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below: _____				
D/B/A: _____				
ATTORNEY FOR THIS DEFENDANT: _____ Bar No. _____ or Name: _____ Pro Hac Vice (✓) _____ (If known)				
In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.				
Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Bankruptcy <input type="checkbox"/> Business Dissolution - Corporation <input type="checkbox"/> Business Dissolution - Partnership <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Examination of Debtor <input type="checkbox"/> Execution <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Pension <input type="checkbox"/> Receivership <input type="checkbox"/> Replevin <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other _____		Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Power of Attorney <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____ Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> ERISA <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Extraordinary Writ <input type="checkbox"/> Federal Statutes <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Municipal Annexation <input type="checkbox"/> Racketeering (RICO) <input type="checkbox"/> Railroad <input type="checkbox"/> Seaman <input type="checkbox"/> Other _____ Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Employment Security Comm'n <input type="checkbox"/> Municipal Court <input type="checkbox"/> Oil & Gas Board <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other _____		
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Differences <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (formerly URESA) <input type="checkbox"/> Other _____ Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability under Contract <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____		Children and Minors - Non-Domestic <input type="checkbox"/> Adoption - Noncontested <input type="checkbox"/> Consent to Abortion for Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ Torts-Personal Injury <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Products Liability <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Other <u>Defamation</u> Mass Tort <input type="checkbox"/> Asbestos <input type="checkbox"/> Chemical Spill <input type="checkbox"/> Dioxin <input type="checkbox"/> Hand/Arm Vibration <input type="checkbox"/> Hearing Loss <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> Other _____ Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Receiver Appointment <input type="checkbox"/> Tax Sale: Confirmation/Cancellation <input type="checkbox"/> Title, Boundary &/or Easement <input type="checkbox"/> Other _____ Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief <input type="checkbox"/> Prisoner <input type="checkbox"/> Other _____		

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF _____

Docket No. _____
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed
 Prior to 1/1/94 _____

PLAINTIFFS IN REFERENCED CAUSE - Page 1 of ____ Plaintiffs Pages
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff #2:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Plaintiff #3:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Plaintiff #4:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi
Hancock County

HANDSHOE, DOUGLAS VS THE HALIFAX HERALD LIMITED/JOHN DOE

Case # 15-0062 Acct # Paid By CASH Rct# 28441

CLERK'S FEES	85.00
JURY TAX	3.00
COURT REPORTERS FEE	10.00
LAW LIBRARY	2.50
COURT ADMINISTRATOR	2.00
STATE CT ED FUND	2.00
COURT CONSTITUENTS	.50
ELECTRONIC COURT	10.00
LEGAL ASSISTANCE	5.00
JUDICIAL FUND-JUDGE RAISE	40.00
ARCHIVE FEE	1.00

=====
Total \$ 161.00

Payment received from DOUGLAS HANDSHOE

Transaction 31401 Received 2/13/2015 at 15:18 Drawer 1 I.D. KENDRA

Current Balance Due \$0.00 Receipt Amount \$ 161.00

By  D.C. Karen Ladner Ruhr, Circuit Clerk

ase # 15-0062 Acct # Paid By CASH Rct# 28441

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NUMBER

15-0062

THE HALIFAX HERALD LIMITED
JOHN DOE

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI

TO: The Halifax Herald Limited
Attn: M. L. Croft
2717 Joseph Howe Drive
P. O. Box 610
Halifax, NS Canada B3J 2T2

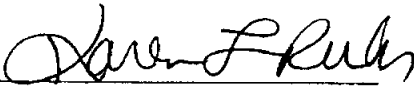
NOTICE TO DEFENDANT(S)

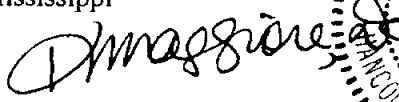
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to Douglas Handshoe, whose post office address is 214 Corinth Drive, Bay St Louis, MS 39520 and whose street address is 214 Corinth Drive, Bay St Louis, MS 39520. Your response must be mailed or delivered within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this 13th day of February, 2015.


Clerk of Hancock County, Mississippi

By: 



(Seal)

issued to
Maggione

PROOF OF SERVICE--SUMMONS
(Process Server)

The Halifax Herald Limited

Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

___ **FIRST CLASS MAIL AND ACKNOWLEDGEMENT SERVICE.** By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgement and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgement of receipt pursuant to M.R.C.P. Form 1B).

___ **PERSONAL SERVICE.** I personally delivered copies to _____ on the ____ day of _____, 2015, where I found said person in Parish of Jefferson of the State of Louisiana.

___ **RESIDENCE SERVICE.** After exercising reasonable diligence I was unable to deliver copies to said person within _____ county, (state). I served the summons and complaint on the ____ day of _____, 2015, at the usual place of abode of said person by leaving a true copy of the summons and complaint with who is the _____ (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the ____ day of _____, 2015, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

___ **CERTIFIED MAIL SERVICE.** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or the return envelope marked "Refused.")

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$ _____

Process server must list below: [Please print or type]

Name: _____

Address: _____

Telephone No. _____

State of Mississippi
County of Hancock

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process Server Signature

Sworn to and subscribed before me this the _____ day of _____ 2015.

Notary Public

My Commission Expires _____

(Seal)